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7 ATTORNEY FOR DEFENDANT

8 LL BRADFORD AND COMPANY LLC

9  
10 UNITED STATES DISTRICT COURT

11 FOR THE DISTRICT OF NEVADA

12 \* \* \* \*

13 KENNETH LANE, *et. al.*; individually and on  
14 behalf of a class of similarly situated persons,

15 Plaintiffs,

16 vs.

17 CONESTOGA SETTLEMENT SERVICES,  
18 LLC; CONESTOGA INTERNATIONAL  
19 LLC; CONESTOGA TRUST SERVICES,  
20 LLC; L.L. BRADFORD AND COMPANY,  
21 LLC (sic); STRATEGIX SOLUTIONS, LTD.,  
22 MICHAEL McDERMOTT; and JAMES  
23 SETTLEMENT SERVICES, LLC,

24 Defendants.

25 CASE NO.: 2:20-cv-01716-APG-BNW

26 **STIPULATION AND [PROPOSED]**  
**ORDER ENLARGING TIME FOR**  
**DEFENDANT LL BRADFORD AND**  
**COMPANY LLC TO ANSWER OR**  
**OTHERWISE PLEAD.**

27  
28 Defendant LL Bradford and Company LLC, by and through its counsel of record, Michael  
R. Pontoni, Esq., LL.M. ("LL Bradford") and plaintiffs herein represented by their attorneys

Reese Marketos LLP and King & Durham, PLLC (“plaintiffs”) hereby stipulate to enlarge the time by which LL Bradford must respond to the Complaint up to and including **February 1, 2021**.

This Stipulation is made and based upon the following:

1. Plaintiffs filed their Complaint on September 17, 2020. Therein they allege defendants engaged in misconduct including malfeasance that caused money damages to plaintiffs. *ECF No. 1.* Plaintiffs seek certification to represent a class of similarly situated individuals across the country. *Ibid.*
2. Plaintiff's service agent asserts LL Bradford was served with the Complaint on or about October 30, 2020; LL Bradford's response was ostensibly due on or before November 21, 2020.
3. Counsel for LL Bradford represents that the has recently been engaged and requires additional time to evaluate plaintiffs' allegations and prepare a response, taking into account the exercise of due diligence.
4. In light of the foregoing, these parties agree and request that LL Bradford shall have up to, and including, **February 1, 2021**, to respond to the Complaint.

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2 5. LL Bradford thus requests that the Court accept this stipulation and enter this proposed  
3 order. This is LL Bradford's first request for an extension of time. This Stipulation is  
4 entered into in good faith and not for purposes of delay.  
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6

7 DATED this 15th day of January  
8  
9 2021. Michael R. Pontoni, Esq.,  
10 LL.M.

11 */s/ Michael R. Pontoni*  
12 **Attorneys for Defendant LL  
13 Bradford and Company,  
14 LLC**

15 DATED this 15th day of January  
16  
17 2021. REESE MARKETOS LLP

18 */s/ Brett S. Rosenthal*

19 Adam Sanderson, Esq.  
20 Brett S. Rosenthal, Esq.

21 Gregory H. King, Esq.  
22 Matthew Durham, Esq.  
23 KING & DURHAM PLLC

24 ***Attorneys for Plaintiffs***

25 ORDER

26 **IT IS SO ORDERED**

27 **DATED:** 12:07 pm, January 20, 2021

28   
29 **BRENDA WEKSLER**  
30 **UNITED STATES MAGISTRATE JUDGE**